

stands rejected under 35 U.S.C. §103(a) as being unpatentable over van Heeswyk et al in view of Casabona et al. These rejections are traversed as follows.

The present invention is directed to a wireless positioning method for estimating the position of a terminal by using the reception timings of signals. In other words, the present invention uses downlink signals transmitted from at least a first and second base station in a cellular communication system.

On the other hand, Van Heeswyk et al disclose a system in which a user's signal, in other words an uplink signal, is received by several fixed base stations and the difference in the timing of arrivals of the signals at the base stations is used to estimate the user's position (see column 1, lines 49-53). Van Heeswyk et al et al is concerned with removing the extra interference created by the user being located during an emergency call when that user raises his transmitter power (see column 2, lines 30-34). This way, the quality of other users' signals on the network is not degraded (see column 2, lines 34-35).

Therefore, it should be readily understandable that the present invention is completely different from Van Heeswyk et al. The present invention measures reception timings of both signals of first and second base stations as recited in claims

2, 9 and 15. This is done to estimate the position of the terminal using downlink signals from plural base stations.

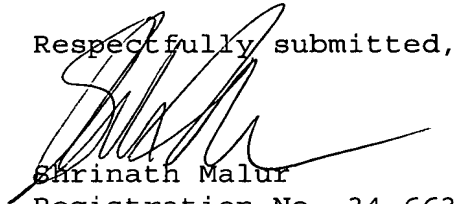
Incidentally, Van Heeswyk et al does not disclose any measurement of reception timings of other users after estimating the one user's position and removing the extra interference created by that user. In addition, no signal except the power-up signal during the emergency call is used for transmitting the position of the terminal. Therefore, the limitation regarding the measuring of the reception timing of another signal after canceling a received signal from a first base station having a power higher than that of a received signal from a second base station, as recited in the pending claims, is neither anticipated nor rendered obvious by Van Heeswyk et al.

Finally, the deficiencies in Van Heeswyk et al are not overcome by resort to Casabona et al. The Examiner relies upon Casabona et al merely for the disclosure of an AGC circuit. This teaching fails to overcome the other deficiencies of Van Heeswyk et al. As such, it is submitted that the pending claims patentably define the present invention over the cited art.

CONCLUSION

In view of the foregoing amendments and remarks,
Applicants contend that the above-identified application is
now in condition for allowance. Accordingly, reconsideration
and reexamination are respectfully requested.

Respectfully submitted,



Shrinath Malur
Registration No. 34,663
Attorney for Applicants

MATTINGLY, STANGER & MALUR
1800 Diagonal Rd., Suite 370
Alexandria, Virginia 22314
(703) 684-1120
Date: October 30, 2003